

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BARBARA F. STRICKLAND,
YOLANDA LEE, on behalf of plaintiffs and the
class described herein,

Plaintiff,

V.

TSYS TOTAL DEBT MANAGEMENT, INC.
d/b/a NATIONAL ATTORNEY NETWORK.

Defendant.

Case No.: 08 CV 34

Judge Lindberg

Magistrate Judge Brown

MOTION FOR ENLARGEMENT OF TIME TO
ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT

Defendant, TSYS Total Debt Management, Inc. (“TSYS”), by its attorneys, Peter D. Sullivan and Jennifer W. Weller, pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this court grant it a 21-day enlargement of time, or up until February 19, 2008, to file a responsive pleading to Plaintiff’s Complaint, and in support thereof, states as follows:

1. On January 2, 2008, plaintiffs filed their complaint against TSYS alleging violations of the Fair Debt Collection Practices Act (“FDCPA”).
2. Defendant’s responsive pleading is currently due on January 29, 2008.
3. Defense counsel has recently been retained and requests additional time to review the relevant facts and documents with its client in order to prepare a responsive pleading.
4. Defense counsel has spoken to plaintiff’s counsel and he has indicated that he has no objection to this motion.
5. The additional time will not cause any delay or prejudice any party in this case.

WHEREFORE, defendant, TSYS TOTAL DEBT MANAGEMENT, INC. respectfully requests this court grant it an enlargement of time up to and including February 19, 2008, to file a responsive pleading to Plaintiff's Complaint.

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